

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

SARAH,

Plaintiff,

v.

Google LLC, YouTube LLC, James JACKSON, also known online as “ONISION,” and LUCAS JACKSON, formerly known online as “LAINEYBOT,” “LAINEY” and “KAI,”

Defendants.

CASE No: 1:23-cv-00223-HYJ-SJB

HONORABLE HALA J. JARBOU

MAGISTRATE SALLY J. BERENS

**DECLARATION OF BENJAMIN MARGO**

I, Benjamin Margo, declare and state as follows:

1. I am an attorney admitted to practice in this Court, appearing on behalf of Defendants Google LLC and YouTube, LLC (“YouTube”) in the above-captioned action. I make this declaration based on personal knowledge.

2. YouTube provides its service to users subject to its Terms of Service, which are available at <https://www.youtube.com/t/terms>. They contain the following language:

All claims arising out of or relating to these terms or the Service will be governed by California law, except California’s conflict of laws rules, and will be litigated exclusively in the federal or state courts of Santa Clara

County, California, USA. You and YouTube consent to personal jurisdiction in those courts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 20, 2023 in Hudson County, New Jersey.

/s/ Benjamin Marko  
Benjamin Marko

**CERTIFICATE OF SERVICE**

I hereby certify that on April 20, 2023, I caused the foregoing paper to be electronically filed with the Clerk of Court using the ECF system, which will send notification to counsel of record.

/s/ Christopher M. Trebilcock  
Christopher M. Trebilcock